

**Before the
Federal Communications Commission
Washington, D.C. 20544**

In the Matter of)	
Implementation of the National Suicide Hotline)	WC Docket No. 18-336
Improvement Act of 2018)	

Comments of The National Alliance on Mental Illness

The National Alliance on Mental Illness (NAMI) files comments in response to the Federal Communications Commission (FCC/Commission) Further Notice of Proposed Rulemaking (FNPRM).¹ The FNPRM seeks comments on requiring text providers to support text messaging to 988, a 3-digit dialing code to reach the National Suicide Prevention Lifeline (Lifeline).

NAMI strongly supports FCC’s conclusion that requiring text providers to support text-to-988 will significantly improve the public’s access to the Lifeline, particularly for at-risk populations, thereby saving lives. We strongly encourage FCC to finalize this rule to ensure that more people will be able to reach mental health crisis services and supports when they need it most. Accessing mental health services and supports is a critical part of suicide prevention and mental health crisis intervention. We offer our detailed comments below.

Background

NAMI is the nation’s largest grassroots mental health organization dedicated to building better lives for the millions of people affected by mental illness. The communities we serve and advocate for are as diverse as our country. NAMI is a voice for youth and adolescents, veterans

¹ See *Implementation of the National Suicide Hotline Improvement Act of 2018*, Further Notice of Proposed Rulemaking, WC Docket No. 18-336, (rel. April 23, 2021).

and service members, individuals involved with the criminal justice system, those who are homeless, family caregivers, and everyday Americans who are impacted by mental illness. We are all connected by the shared hope of new and innovative treatments, improved coverage and care, and support for recovery.

I. Require Text Providers to Support Text Messaging to 988

Text messaging is a central part of how people communicate. 81% of Americans say they text regularly,² and over 5.5 billion texts are sent every day.³ The intent behind establishing 988 as a three-digit dialing code for mental health crises was to make it easier for people experiencing a mental health crisis to connect to the help they need. Incorporating text messaging capabilities for 988 helps fulfill this goal by connecting to people through all the different ways they communicate. It is especially essential for reaching people who are most at risk for suicide and mental health crisis.

Nearly 95% of teens have a smartphone and say texting is the primary way they communicate.⁴ Teens are also vulnerable to suicidal ideation and mental health crisis. Suicide is the second leading cause of death amongst teens and young adults.⁵ Research suggests that symptoms of psychosis and mental illness are first experienced when someone is in their late teens or early twenties, and adolescents who experience psychosis are 70 times more likely to

² Pew Research Center. (2015, April). U.S. Smartphone Use in 2015. Retrieved from Pew Research Center: <https://www.pewresearch.org/internet/2015/04/01/us-smartphone-use-in-2015/>.

³ CTIA. (2016, May). 2019 Annual Survey Highlights. Retrieved from CITA: <https://api.ctia.org/wp-content/uploads/2019/06/2019-Annual-Survey-Highlights-FINAL.pdf>.

⁴ Pew Research Center. (2018, May). Teens, Social Media, and Technology 2018. Retrieved from Pew Research Center: <https://www.pewresearch.org/internet/2018/05/31/teens-social-media-technology-2018/>.

⁵ CDC. (2019). 10 Leading Causes of Death, United States. Atlanta, GA: U.S. Department of Health and Human Services.

attempt suicide.⁶ LGBTQ youth are more likely to attempt suicide than youth who are heterosexual,⁷ and suicide rates have been rising among black youth.⁸

Incorporating text messaging capabilities for 988 will also assist in reaching historically marginalized and underserved communities. Communities of color text at a higher rate than whites,⁹ and lower-income households send twice as many texts than households with higher incomes.¹⁰ Text messaging has also become a critical form of communication for people who are deaf, hard of hearing, and who have other disabilities that impact communication.¹¹

The Commission has been an invaluable partner in leading the effort to improve public safety and our nation's emergency response systems. We strongly encourage the FCC to continue that leadership and finalize the proposal to require text providers to support text messaging to 988.

II. Require Bounce-Back Messages

Not only does the FCC have an essential role to play in making 988 more accessible and equitable by requiring text-to-988, the Commission can also help ensure that text messages sent to 988 follow best practices in crisis response. We strongly disagree with the comment cited in the proposed rule that claimed that if at-risk texters receive a bounce-back message regarding the unavailability of services, “the risks of disengagement and adverse outcomes increase.”¹² We do not believe that an automatic bounce-back message will negatively impact individuals seeking

⁶ Tatiana Falcone, M., & Timmons-Mitchell, PhD., J. (2013). Psychosis and Suicidality in Adolescents. *Psychiatric Times*. Vol. 30, No. 12.

⁷ CDC. (2019). Sexual Identity, Sex of Sexual Contacts, and Health-Risk Behaviors Among Students in Grades 9-12: Youth Risk Behavior Surveillance. Atlanta, GA: U.S. Department of Health and Human Services.

⁸ Citation on increase in black youth suicide

⁹ Upland. (2021, April 15). Johns Hopkins Survey Finds Strong Potential for Text Message Interventions. Retrieved from Upland: <https://uplandsoftware.com/mobile-messaging/resources/blog/johns-hopkins-survey-finds-strong-potential-text-message-interventions/>

¹⁰ *Id.*

¹¹ CBS News (2010). For Deaf Texting Offers New Portal to the World. Retrieved from: <https://www.cbsnews.com/news/for-deaf-texting-offers-new-portal-to-world/>

help during a crisis. We contend the opposite. If someone is in crisis and cannot be helped, they should receive a bounce-back message to ensure that they know what else to do to receive help.

In the final rule, we encourage the FCC to require automated bounce-back messages to be sent when text-to-988 is unavailable. Currently, Lifeline offers support from trained crisis counselors through text messaging 24 hours a day. However, if texting services are unavailable, it is vital that a crisis text does not go unanswered. In addition to notifying someone that texting is unavailable in their area, bounce-back messages should include information about alternative ways to reach 988 or crisis services in their area.

III. Convene Stakeholders on 988 Implementation

Reimagining a mental health crisis response system built around 988 will require coordination and collaboration among many stakeholders. NAMI believes that FCC is uniquely positioned to convene stakeholders on the implementation of 988. The Commission and industry would benefit from the discussion and coordination required for implementation to succeed. The convening could showcase the progress that stakeholders and providers of 988 services have made towards implementing by July 2022. It could also provide an opportunity to identify challenges to implementation and initiate discussion on how best to overcome them. In addition, a convening could provide advice and recommendations beyond the current rulemaking process to accelerate or meet the deployment of 988. We embrace the need for the forum and offer NAMI's support and assistance.

IV. Establish a Uniform Deadline for Text-to-988

Finally, we encourage the FCC to require a national uniform deadline for texting so that text-to-988 is available at or before the same time voice calls to 988 are available by July 2022. Delaying an implementation deadline will not prevent people in crisis from reaching out to 988

through text; instead, when someone sends a text message to 988, their request for help will go unanswered and they will simply not get the help they need.

Conclusion

NAMI strongly believes that 988 will save lives and is a critical component to ensuring people in crisis are diverted from criminal justice system involvement and connected to appropriate services and supports. NAMI also recognizes that technology is constantly changing, with a direct impact on the way people communicate. We ask the FCC to continue to explore its authority, and engage the public and other stakeholders, to ensure 988 will be accessible through new and next-generation technologies. We encourage you to finalize the FNPRM and provide rules as expeditiously as possible, as the public interest so requires. We thank the Commission for considering our comments. If you have any questions or would like to discuss further, please contact Jennifer Snow at jsnow@nami.org.

Respectfully submitted,

A handwritten signature in blue ink that reads "Angela Kimball".

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